

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JORGE RODRIGUEZ, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CITIMORTGAGE, INC.,

Defendant.

Civil Action No.: 11-cv-4718-PGG

**PLAINTIFF'S NOTICE OF
MOTION FOR APPROVAL
OF THE PAYMENT OF THE
AGREED-UPON
ATTORNEYS' FEES, COSTS
AND EXPENSES, AND THE
AGREED-UPON INCENTIVE
AWARD TO THE CLASS
REPRESENTATIVE**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 6, 2015 at 2:30 p.m. before the Honorable Paul G. Gardephe, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York 10007, Plaintiff Jorge Rodriguez, by and through Class Counsel, will move and hereby does move for an order approving the payment of the agreed-upon attorneys' fees, costs, and expenses, and incentive award to the Class Representative, in accordance with the Class Settlement Agreement.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiff will rely upon the accompanying memorandum of law in support, the Declarations of Scott A. Bursor, Antonio Vozzolo, and Gary Lynch, with annexed exhibits, and the Revised Affidavit of Jack Matlock. A proposed order granting the requested relief was previously filed as Exhibit B to the Settlement Agreement, Dkt. No. 39, in connection with Plaintiff's Motion For Preliminary Approval Of Class Action Settlement. A courtesy copy of that proposed order will be filed herewith for the Court's convenience.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument.

Dated: September 4, 2015

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Scott A. Bursor
Scott A. Bursor

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